IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

Case No. 16-1132
Consolidated with Case No. 16-1173

PRIME HEALTHCARE PARADISE VALLEY, LLC,

Petitioner,

v.

NATIONAL LABOR RELATIONS BOARD,

Respondent.

**PETITIONER PRIME HEALTHCARE PARADISE VALLEY'S
UNOPPOSED MOTION FOR A 30-DAY EXTENSION OF TIME TO FILE
ITS OPENING BRIEF**

To the Honorable, the Judges of the United States Court of Appeals for the District of Columbia Circuit:

Petitioner Prime Healthcare Paradise Valley, LLC hereby moves the Court for a 30-day extension of time for the filing of Petitioner's opening brief, from August 9, 2016 to September 8, 2016, and shows as follows:

1.   Petitioner's opening brief is currently due on August 9, 2016.

2.   Petitioner has not previously requested an extension of time from this Court.

SMRH:478637230.1

3.   Counsel for Petitioner requests this extension of time in light of several deadlines in other matters that conflict with the August 9, 2016 filing deadline, including a previously-scheduled, court-ordered deadline to file briefing in opposition to a dispositive motion in a different matter as well as various other trial and appellate court filing deadlines.

4.   In addition, Attorney Robert Mussig, who is Petitioner's attorney with primary responsibility for drafting Petitioner's opening brief in this matter, has a pre-planned vacation in late July/early August and as a result will be away from the office for several days immediately preceding the current filing deadline.

5.   Respondent's Counsel, Jeffrey Burritt, does not oppose Petitioner's request, with the understanding that the deadline for Respondent to file its brief will also be continued by 33 days, from September 8, 2016 to October 11, 2016 (as the 30th day falls on a Saturday, and the following Monday is a holiday).

7.   In light of the above-requested extensions, Petitioner requests that its deadline to file its reply brief be extended by 32 days, from September 22, 2016, 2016 to October 24, 2016 (as the 30th day falls on a Saturday), that the deadline to file the deferred appendix be extended by 32 days, from September 29, 2016 to October 31, 2016 (as the 30th day falls on a Saturday), and that the deadline to file final briefs be extended by 32 days, from October 13, 2016 to November 14, 2016 (as the 30th day falls on a Saturday).

WHEREFORE, Petitioner respectfully requests that the Court grant this

motion and extend the time for the filing of Petitioner's opening brief by 30 days,

to September 8, 2016.

Dated: July 21, 2016

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CERTIFICATE OF SERVICE

I hereby certify that on July 21, 2016, I caused a true and accurate copy of the foregoing **PETITIONER PRIME HEALTHCARE PARADISE VALLEY'S UNOPPOSED MOTION FOR A 30-DAY EXTENSION OF TIME TO FILE ITS OPENING BRIEF** to be served via electronic delivery and/or First Class U.S. Mail, postage prepaid on the following persons:

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Dated: July 21, 2016

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